



U.S. Environmental Protection Agency

Region 1 – New England
5 Post Office Square – Suite 100
Boston, MA 02109-3912

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

MAR 10 2017

Hon. Anita Dugatto, Mayor
City of Derby
1 Elizabeth Street
Derby, CT 06418

Re: Request for Information Pursuant to Section 308 of the Clean Water Act, EPA Docket
No. CWA-308-R01-FY17-26

Dear Mayor Dugatto:

Enclosed is a Request for Information ("Request") issued by the U.S. Environmental Protection Agency ("EPA") pursuant to Section 308(a) of the Clean Water Act (the "Act"), 33 U.S.C. § 1318(a).

The Request pertains to the City of Derby's (the "City") Municipal Separate Storm Sewer System ("MS4"). Stormwater discharges and certain non-stormwater discharges from the City's MS4 are authorized by the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems ("MS4 Permit"), issued by the Connecticut Department of Energy and Environmental Protection ("CT DEEP").

The MS4 Permit was first issued on January 9, 2004 ("2004 MS4 Permit"). The MS4 Permit was re-issued without changes on January 9, 2009, and January 12, 2016; the MS4 Permit will expire on June 30, 2017. A modified MS4 Permit was issued on January 20, 2016, with an effective date of July 1, 2017 (the "2016 MS4 Permit").

On September 29, 2006, CT DEEP issued Notice of Violation ("NOV") No. WR SW 06 029 to the City. On November 3, 2006, the City provided a Stormwater Management Plan to CT DEEP and EPA.

On June 30, 2014, the City and CT DEEP agreed to Consent Order No. WR SW 13 010.

On October 4, 2016, CT DEEP issued NOV No. F NOV WR SW 16 130 to the City.

Section 308(a) of the Act, 33 U.S.C. § 1318(a), authorizes EPA to require the owner or operator of a point source to provide information needed to determine whether there has been a violation of the Act.

The City is hereby required, pursuant to Section 308(a) of the Act to respond to the Request, as contained in this letter and the Attachments A through C by **within 30 days of receipt of this letter**, unless otherwise specified in Attachment B. Please read the instructions in Attachment A carefully before preparing your response and answer each item in Attachment B as clearly and completely as possible.

Your response to the Request must also be accompanied by a certificate that it is signed and dated by the person who is authorized to respond to the Request. A Statement of Certification, Attachment C, is attached to this letter.

EPA Region 1 has prepared a draft "Bacterial Source Tracking Protocol" with example procedures for investigation of MS4s for illicit discharges. For the City's reference, the draft protocol is included as Attachment D of this Request.

Information submitted pursuant to the Request shall be submitted on paper and in an electronic format to the following addresses:

John Melcher
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code: OES04-1
Boston, MA 02109-3912
melcher.john@epa.gov

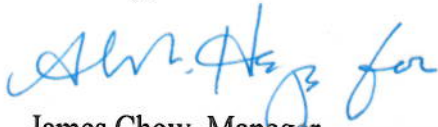
and

Kim Hudak
Connecticut Department of Energy and Environmental Protection
BMMCA/WPED
79 Elm Street
Hartford, CT 06106-5127
kim.hudak@ct.gov

Compliance with the Request is mandatory. Failure to respond fully and truthfully, or to adequately justify any failure to respond within the time frame specified above, also constitutes a violation of the Act subject to enforcement action, including the assessment of penalties. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal prosecution under 18 U.S.C. § 1001.

If you have questions regarding the Order or the Request, please contact John Melcher, Enforcement Officer of my staff at (617) 918-1663, or have your attorney contact Jeffrey Kopf, Senior Enforcement Counsel at (617) 918-1796.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Chow", followed by the word "for" in a cursive script.

James Chow, Manager
Technical Enforcement Office
Office of Environmental Stewardship

cc (electronic): Kim Hudak, CT DEEP
 John Melcher, EPA
 Jeffrey Kopf, EPA
 Jean Perry Phillips, Pullman & Comley, LLC
 Lindsay King, City of Derby
 Jack Walsh, City of Derby

Enclosures:

- Attachment A - Request for Information Instructions
- Attachment B - Request for Information
- Attachment C - Request for Information Statement of Certification
- Attachment D - EPA New England Bacterial Source Tracking Protocol, January 2012
Draft

Attachment A

Request for Information Instructions

1. Provide a separate narrative response to each and every item and subpart thereof set forth in the Request. Precede each response with the text and the number of the item and the subpart to which the response corresponds.
2. If you cannot respond to any item in full, respond to the extent possible. If your responses are qualified in any manner, explain.
3. Any documents referenced or relied upon by you to respond to the Request must be copied and submitted to EPA with your response. All documents must contain a notation indicating the item and subpart to which they are responding. If the documentation that supports a response to one item duplicates the documentation that supports another item, submit one copy of the documentation and reference the documentation in subsequent responses.
4. If information or documents not known or not available to you as of the date of the submission of the response to the Request should later become known, or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is inaccurate or incomplete, you must notify the EPA of this finding as soon as possible and provide a corrected response.

Attachment B

Request for Information

Total Maximum Daily Load ("TMDL") Allocations

1. Section 6(k) of the 2004 MS4 Permit requires that, following the approval of a TMDL for any waterbody into which the City discharges, the City review its SWMP if the TMDL includes requirements for control of stormwater discharges. Submit a list of all water bodies to which the City discharges stormwater, either directly or indirectly, that have approved TMDLs.¹ If separate wasteload allocations have been established for different segments of a single water body, list each segment separately. For each water body on this list include the following information:
 - a. The water body name, segment name (if applicable), and pollutant(s) causing the impairment;
 - b. The number of City MS4 outfalls discharging to the water body (or water body segment if applicable);
 - c. For each approved TMDL approved for the water body, describe all requirements for control of stormwater discharges;
 - d. Provide a list of the modifications made to the City's SWMP in response to TMDLs, as required by Section 6(k) of the 2004 MS4 Permit.

Stormwater Management Plan

2. Section 6 of the 2004 MS4 Permit requires that the City develop a Stormwater Management Plan ("SWMP"). Provide a copy of the City's current SWMP. The City is not required to submit the SWMP dated November 3, 2006 ("2006 SWMP"), that it provided to CT DEEP and EPA in response to NOV No. WR SW 06 if the SWMP has not been updated since this date.
3. Section 4(d)(2) of the 2016 MS4 Permit requires that the City shall make its SWMP available, electronically and at a publically available location, for public review and comment at least 90 days prior to the effective date of the 2016 MS4 Permit. Provide a draft SWMP, prepared in accordance with Section 4(d)(2) of the 2016 MS4 Permit.

Annual Report

4. Section 6(i) of the 2004 MS4 Permit requires that the City, by January 1 of each year, submit an annual report to CT DEEP. Provide the City's Annual Reports, prepared in

¹ A useful reference to which the City may want to refer is the municipal factsheets published by CT DEEP and available at http://www.ct.gov/deep/cwp/view.asp?a=2721&q=558562&DEEPNav_GID=1654.

accordance with Section 6(i) of the 2004 MS4 Permit, for the years 2012, 2013, 2014, 2015, and 2016.

Illicit Discharge Detection and Elimination

5. Section 6(a)(3)(A)(i) of the 2004 MS4 Permit requires the City to implement an ordinance or other regulatory mechanism to effectively prohibit non-stormwater discharges, except as provided by Section 3(a)(2) of the 2004 MS4 Permit, into the MS4, as well as sanctions to ensure compliance, to the extent allowable under State or local law. Section 5.3 of the City's 2006 SWMP states that the City would implement such ordinances in 2007. Provide the City's ordinances implemented in accordance with Section 6(a)(3)(A)(i) of the 2004 MS4 Permit.
6. Section 6(a)(3)(B)(i) and (ii) of the 2004 MS4 Permit requires the City to develop maps of its MS4 outfalls and receiving waters. Section 5.3 of the City's 2006 SWMP states that the City would implement such maps in 2007 and 2008. Provide the City's maps prepared in accordance with Section 6(a)(3)(B)(i) and (ii) of the 2004 MS4 Permit.
7. Section 6(a)(3)(B)(iii) of the 2004 MS4 Permit requires the City to develop, implement, and enforce a program to detect and eliminate existing illicit discharges, as defined by 40 C.F.R. 122.26(b)(2), into the MS4.
 - a. Section 5.3 of the City's 2006 SWMP states that the City would sample 25% of outfalls where dry weather discharge is identified. Provide copies of all such sampling results.
 - b. Section 5.3 of the City's 2006 SWMP states that the City would attempt to identify the source of illicit discharges found in dry weather sampling. Provide a description of all such investigations performed.
 - c. Section 5.3.4 of the City's 2006 SWMP states that the City would develop its own illicit discharge detection program. Provide documentation of any such program developed.

Outfall and Interconnection Screening and Sampling

8. The authority of EPA to require the owner or operator of any point source to "sample such effluents (in accordance with such methods, at such locations, at such intervals, and in such manner as the Administrator shall prescribe)" is specifically enumerated in Section 308(a)(4)(A)(iv) of the Act.

In accordance with the following requirements, provide inspection and sampling results for the City's MS4 outfalls and interconnections.²

² An interconnection means the point where the City's MS4 discharges to another MS4 or other storm sewer system, through which the discharge is conveyed to waters of the state or to another storm sewer system and eventually to a water of the state.

If an outfall is inaccessible or submerged, the City shall proceed to the first accessible upstream manhole or structure for the observation and sampling and report the location with the screening results. If an interconnection is inaccessible or submerged, interconnection screening shall occur at the first accessible location within the City's system upgradient of the interconnection.

For this section, results from sampling already performed by the City as it has implemented its illicit discharge detection program may be submitted.

- a. Perform dry-weather screening and sampling:
 - i. Complete dry-weather screening and sampling in accordance with item 8.a of this Request for all City MS4 outfalls and interconnections by **September 1, 2017**.
 - ii. Provide dry-weather screening and sampling results to EPA and CT DEEP by **October 1, 2017**.
 - iii. Dry-weather screening and sampling shall proceed only when no more than 0.1 inches of rainfall has occurred in the previous 24-hour period.
 - iv. For each outfall and interconnection where dry-weather screening and sampling is conducted, provide the following information: unique identifier, receiving water, date of inspection, dimensions, shape, material (e.g., concrete, PVC), spatial location (latitude and longitude with a minimum accuracy of +/-30 feet), physical condition, and indicators of potential non-stormwater discharges (including presence or evidence of suspect flow and sensory observations such as odor, color, turbidity, floatables, or oil sheen).
 - v. When a flow is observed, a sample of the flow shall be collected and analyzed for *E. coli* bacteria, surfactants, ammonia, total residual chlorine, temperature, conductivity, and salinity. Sample analysis for bacteria concentration shall be analyzed according to the methods prescribed in Title 40, Code of Federal Regulations, Part 136. Sample analysis for surfactants, ammonia, total residual chlorine, temperature, conductivity, and salinity may be performed in the field. Example field analysis equipment are provided in Tables 1 and 2 of EPA Region 1's "EPA New England Bacterial Source Tracking Protocol," January 2012 Draft (included in this Request as Attachment D).
 - vi. If no dry weather flow is observed, the City shall record the condition of the outfall or interconnection and other relevant information. If no flow is observed, but evidence of dry weather flow exists, the City shall revisit the outfall or interconnection during dry weather within one week of the initial observation, if practicable, to perform a second dry weather screening and sample any observed flow.

- b. Perform wet-weather screening and sampling:
- i. Complete wet-weather screening and sampling in accordance with item 8.b of this Request by **July 1, 2018**.
 - ii. Provide wet-weather screening and sampling results to EPA and CT DEEP by **August 1, 2018**.
 - iii. Wet-weather screening and sampling shall proceed during or after a storm event of sufficient depth or intensity to produce a stormwater discharge but only during the spring (March 1 to June 30) when groundwater levels are relatively high. This Request does not require a minimum rainfall event prior to wet weather screening. However, the purpose of wet weather screening and sampling under the IDDE program is to identify illicit discharges that may activate or become evident during wet weather. The City may incorporate provisions in its IDDE program that assist in targeting such discharges, including avoiding sampling during the initial period of discharge ("first flush") and/or identifying minimum storm event intensities likely to trigger sanitary sewer interconnections.
 - iv. Wet-weather screening and sampling shall be performed, at a minimum, at those outfalls or interconnections where flow was not observed during dry-weather inspections or sampling, as well as those outfalls or interconnections where dry-weather screening and sampling did not indicate that illicit discharges were present. For purposes of this Request, dry-weather screening or sampling shall indicate the presence of illicit discharges when any of the following conditions are observed:
 - A. Olfactory or visual evidence of sewage;
 - B. *E. coli* bacteria concentration equal to or greater than 235 colonies per 100 mL and surfactant concentration equal to or greater than 0.25 milligrams per liter ("mg/l") via field kits (or 0.1 mg/l via laboratory analysis); or
 - C. *E. coli* bacteria concentration equal to or greater than 235 colonies per 100 mL and ammonia concentration of greater than or equal to 0.5 mg/l via field kits (or 0.1 mg/l via laboratory analysis); or
 - D. Total residual chlorine greater than 0.02 mg/l, and
 - 1) an ammonia concentration of greater than or equal to 0.5 mg/l via field kits (or 0.1 mg/l via laboratory analysis); or
 - 2) a surfactant concentration equal to or greater than 0.25 mg/l via field kits (or 0.1 mg/l via laboratory analysis).

- v. For each outfall and interconnection where wet-weather screening and sampling is conducted, provide the date of inspection and observations of indicators of potential non-stormwater discharges (including presence or evidence of suspect flow and sensory observations such as odor, color, turbidity, floatables, or oil sheen).
- vi. For each outfall and interconnection where wet-weather screening and sampling is conducted, a sample of the flow shall be collected and analyzed for the parameters outlined in item 8.a.v, above.

End of Request

Attachment C

Statement of Certification

Complete and Include With Your Response to the Request for Information

I declare under penalty of perjury that I am authorized to respond on behalf of the City of Derby. I certify that the foregoing responses and information submitted were prepared by me, or under my direction or supervision and that I have personal knowledge of all matters set forth in the responses and the accompanying information. I certify that the responses are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

By _____
(Signature)

(Printed)

(Title)

(Date)

Attachment D

EPA New England Bacterial Source Tracking Protocol, January 2012 Draft

EPA New England Bacterial Source Tracking Protocol

Draft – January 2012

Purpose

This document provides a common framework for EPA New England (“EPA-NE”) staff to develop and implement bacterial source tracking sample events, and provides a recommended approach to watershed association, municipal, and State personnel. Adopted from Boston Water and Sewer Commission (“BWSC”) (2004), Pitt (2004), and based upon fieldwork conducted and data collected by EPA-NE, the protocol relies primarily on visual observations and the use of field test kits and portable instrumentation during dry and wet weather to complete a screening-level investigation of stormwater outfall discharges or flows within the drainage system. When necessary, the addition of more conclusive chemical markers may be included. The protocol is applicable to most typical Municipal Separate Storm Sewer Systems (“MS4s”) and smaller tributary streams. The smaller the upstream catchment area and/or more concentrated the flow, the greater the likelihood of identifying an upstream wastewater source.

Introduction

The protocol is structured into several phases of work that progress through investigation planning and design, laboratory coordination, sample collection, and data evaluation. The protocol involves the concurrent collection and analyses of water samples for surfactants, ammonia, total chlorine, and bacteria. When more precise confirmation regarding the presence or absence of human sanitary sewage is necessary, and laboratory capacity is available, the additional concurrent collection of samples for select Pharmaceutical and Personal Care Product (“PPCP”) analysis is advised. When presented with a medium to large watershed or numerous stormwater outfalls, the recommended protocol is the screening of all outfalls using the surfactant, ammonia, total chlorine, and bacterial analyses, in addition to a thorough visual assessment. The resulting data and information should then be used to prioritize and sample a subset of outfalls for all parameters, including PPCP compounds and additional analyses as appropriate. Ideally, screening-level analyses can be conducted by state, municipal, or local watershed association personnel, and a prioritized sub-set of outfalls can be sampled through a commercial laboratory or by EPA-NE using more advanced confirmatory techniques.

Step I – Reconnaissance and Investigation Design

Each sample event should be designed to answer a specific problem statement and work to identify the source of contamination. Any relevant data or reports from State, municipal, or local watershed associations should be reviewed when selecting sample locations. Aerial photography, mapping services, or satellite imagery resources are available free to the public through the internet, and offer an ideal way to pre-select locations for either field verification or sampling.

Sample locations should be selected to segregate outfall sub-catchment areas or surface waters into meaningful sections. A common investigative approach would be the identification of a

specific reach of a surface water body that is known to be impaired for bacteria. Within this specific reach, stormwater outfalls and smaller tributary streams would be identified by desktop reconnaissance, municipal outfall mapping, and field investigation when necessary. Priority outfalls or areas to field verify the presence of outfalls should be selected based on a number of factors, including but not limited to the following: those areas with direct discharges to critical or impaired waters (e.g. water supplies, swimming beaches); areas served by common/twin-invert manholes or underdrains; areas with inadequate levels of sanitary sewer service, Sanitary Sewer Overflows (“SSOs”) or the subject of numerous/chronic sanitary sewer customer complaints; formerly combined sewer areas that have been separated; culverted streams, and; outfalls in densely populated areas with older infrastructure. Pitt (2004) provides additional detailed guidance.

When investigating an area for the first time, the examination of outfalls in dry-weather is recommended to identify those with dry-weather flow, odor, and the presence of white or gray filamentous bacterial growth that is common (but not exclusively present) in outfalls contaminated with sanitary. For those outfalls with dry-weather flow and no obvious signs of contamination, one should never assume the discharge is uncontaminated. Sampling by EPA-NE staff has identified a number of outfalls with clear, odorless discharges that upon sampling and analyses were quite contaminated. Local physical and chemical conditions, in addition to the numerous causes of illicit discharges, create outfall discharges that can be quite variable in appearance. Outfalls with no dry-weather flow should be documented, and examined for staining or the presence of any obvious signs of past wastewater discharges downstream of the outfall.

As discussed in BWSC (2004), the protocol may be used to sample discreet portions of an MS4 sub-catchment area by collecting samples from selected junction manholes within the stormwater system. This protocol expands on the BWSC process and recommends the concurrent collection of bacteria, surfactant, ammonia, and chlorine samples at each location to better identify and prioritize contributing sources of illicit discharges, and the collection of PPCP compounds when more conclusive source identification is necessary.

Finally, as discussed further in Step IV, application of this sampling protocol in wet-weather is recommended for most outfalls, as wet-weather sampling data may indicate a number of illicit discharge situations that may not be identified in dry weather.

Step II – Laboratory Coordination

All sampling should be conducted in accordance with a Quality Assurance Project Plan (“QAPP”). A model QAPP is included as Attachment 1. While the QAPP details sample collection, preservation, and quality control requirements, detailed coordination with the appropriate laboratory staff will be necessary. Often sample events will need to be scheduled well in advance. In addition, the sampling team must be aware of the strict holding time requirements for bacterial samples – typically samples analysis must begin within 6 hours of sample collection. For sample analyses conducted by a commercial laboratory, appropriate coordination must occur to determine each facilities respective procedures and requirements.

The recommendations in this protocol are based on the use of a currently unpublished EPA-NE modification to *EPA Method 1694 – Pharmaceuticals and Personal Care Products in Water, Soil, Sediment, and Biosolids by HPLC/MS/MS*. Several commercial laboratories may offer Method 1694 capability. EPA-NE recommends those entities wishing to utilize a contract laboratory for PPCP analyses ensure that the laboratory will provide quantitative analyses for acetaminophen, caffeine, cotinine, carbamazepine, and 1,7-dimethylexanthine, at Reporting Limits similar to those used by EPA-NE (See Attachment 2). Currently, the EPA-NE laboratory has limited capacity for PPCP sampling, and any proposed EPA-NE PPCP sample events must be coordinated well in advance with the appropriate staff.

Step III – Sample Collection

Once a targeted set of outfalls has been selected, concurrent sampling and analyses for surfactants, ammonia, and total chlorine (which can all be done through the use of field kits), in addition to bacteria (via laboratory analysis) should be conducted. When numerous outfalls with dry-weather flow exist, sample locations should be prioritized according to the criteria mentioned above. In addition, field screening using only the field kits may occur during the field reconnaissance. However, it must be emphasized that the concurrent sampling and analyses of bacteria, surfactant, ammonia, and total chlorine parameters is the most efficient and cost-effective screening method.

When first observed, the physical attributes of each outfall or sampling location should be noted for construction materials, size, flow volume, odor, and all other characteristics listed on the data collection form (Attachment 3). In addition, GPS coordinates should be collected and a photograph of the sample location taken. Whenever possible, the sampling of storm drain outfalls should be conducted as close to the outfall opening as possible. Bacterial samples should be collected first, with care to not disturb sediment materials or collect surface debris/scum as best possible. A separate bottle is used to collect a single water sample from which aliquots will be analyzed for surfactants, ammonia, and total chlorine. A sample for PPCP analysis is recommended to be collected last, as the larger volume required and larger bottle size may cause some sediment disturbance in smaller outfalls or streams. If necessary, a second smaller, sterile and pre-cleaned sampling bottle may be used to collect the surface water which can then be poured into the larger PPCP bottle. Last, a properly calibrated temperature/specific conductance/salinity meter should be used to record all three parameters directly from the stream or outfall. When flow volume or depth is insufficient to immerse the meter probe, a clean sample bottle may be utilized to collect a sufficient volume of water to immerse the probe. In such instances, meter readings should be taken immediately.

As soon as reasonably possible, sample aliquots from the field kit bottle should be analyzed. When concurrent analyses are not possible, ammonia and chlorine samples should be processed first, followed by surfactant analysis, according to each respective Standard Operating Procedure as appropriate based on the particular brand and type of field test kit being used. All waste from the field test kits should be retained and disposed of according to manufacture instructions. Where waste disposal issues would otherwise limit the use of field kits, EPA-NE recommends

that, at a minimum, ammonia test strips with a Reporting Limit below 0.5 mg/L be utilized. Such test strips typically are inexpensive and have no liquid reagents associated with their use. Results should be recorded, samples placed in a cooler on ice, and staff should proceed to the next sample location.

Upon completion of sampling and return to the laboratory, all samples will be turned over to the appropriate sample custodian(s) and accompanied by an appropriate Chain-of-Custody ("COC") form.

Step IV – Data Evaluation

Bacterial results should be compared to the applicable water quality standards. Surfactant and ammonia concentrations should be compared to the thresholds listed in Table 1. Evaluation of the data should include a review for potential positive results due to sources other than human wastewater, and for false negative results due to chemical action or interferences. In the EPA-NE region, field sampling has indicated that the biological breakdown of organic material in historically filled tidal wetlands may cause elevated ammonia readings, as can the discharge from many landfills. In addition, salinity levels greater than 1 part per thousand may cause elevated surfactant readings, the presence of oil may likewise indicate elevated levels, and fine suspended particulate matter may cause inconclusive surfactant readings (for example, the indicator ampule may turn green instead of a shade of blue). Finally, elevated chlorine from leaking drinking water infrastructure or contained in the illicit wastewater discharge may inhibit bacterial growth and cause very low bacterial concentrations. Any detection of total chlorine above the instrument Reporting Limit should be noted.

Table 1 – Freshwater Water Quality Criteria, Threshold Levels, and Example Instrumentation¹

Analyte/ Indicator	Threshold Levels/ Single Sample ³	Instrumentation
E. coli ²	235 cfu/100ml	Laboratory via approved method
Enterococci ²	61 cfu/100ml	Laboratory via approved method
Surfactants (as MBAS)	≥ 0.25 mg/l	MBAS Test Kit (e.g. CHEMetrics K-9400)
Ammonia (NH ₃)	≥ 0.5 mg/l	Ammonia Test Strips (e.g. Hach brand)
Chlorine	> Reporting Limit	Field Meter (e.g. Hach Pocket Colorimeter II)
Temperature	See Respective State Regulations	Temperature/Conductivity/Salinity Meter (e.g. YSI Model 30)

¹ The mention of trade names or commercial products does not constitute endorsement or recommendation for use by the U.S. EPA

² 314 CMR 4.00 MA - Surface Water Quality Standards - Class B Waters.

³ Levels that may be indicative of potential wastewater or washwater contamination

Once dry-weather data has been examined and compared to the appropriate threshold values, outfalls or more discreet reaches of surface water can be selected for sampling or further investigation. Wet-weather sampling is also recommended for all outfalls, in particular for those that did not have flow in dry weather or those with dry-weather flow that passed screening thresholds. Wet-weather sampling will identify a number of situations that would otherwise pass unnoticed in dry weather. These wet-weather situations include, but are not limited to the following: elevated groundwater that can now cause an exchange of wastewater between cracked or broken sanitary sewers, failed septic systems, underdrains, and storm drains; increased sewer volume that can exfiltrate through cracks in the sanitary piping; increased sewer volume that can enter the storm drain system in common manholes or directly-piped connections to storm drains; areas subject to capacity-related SSO discharges, and; illicit connections that are not carried through the storm drain system in dry-weather.

Step V – Costs

Use of field test kits and field instruments for a majority of the analytical parameters allows for a significantly reduced analytical cost. Estimated instrument costs and pro-rated costs per 100 samples are included in Table 2. The cost per 100 samples metric allows averaged costs to account for reagent refills that are typically less expensive as they do not include the instrument cost, and to average out the initial capital cost for an instrument such as a temperature/conductivity/salinity meter. For such capital costs as the meters, the cost over time will continue to decrease.

Table 2 – Estimated Field Screening Analytical Costs ¹

Analyte/ Indicator	Instrument or Meter ²	Instrument or Meter Cost/No. of Samples	Cost per Sample (Based on 100 Samples) ³
Surfactants (as MBAS)	Chemetrics K- 9400	\$77.35/20 samples (\$58.08/20 sample refill)	\$3.09
Ammonia (NH ₃)	Hach brand 0 – 6 mg/l	\$18.59/25 samples	\$0.74
Total Chlorine	Hach Pocket Colorimeter II	\$389/100 samples (\$21.89 per 100 sample refill)	\$3.89
Temperature/ Conductivity/ Salinity	YSI	\$490 (meter and cable probe)	\$4.90

¹ Estimated costs as of February 2011

² The mention of trade names or commercial products does not constitute endorsement or recommendation for use by the U.S. EPA

³ One-time meter costs and/or refill kits will reduce sample costs over time

From Table 2, the field analytical cost is approximately \$13 per outfall. Typical bacterial analyses costs can vary depending on the analyte, method, and total number of samples to be

performed by the laboratory. These bacterial analyses costs can range from \$20 to \$60. Therefore, the analytical cost for a single outfall, based on the cost per 100 samples, ranges from \$33 to \$73. As indicated above, these costs will decrease slightly over time due to one-time capitals costs for the chlorine and temperature/conductivity/salinity meters.

Step VI – Follow-Up

Once all laboratory data has been reviewed and determined final in accordance with appropriate quality assurance controls, results should be reviewed with appropriate stakeholders to determine next steps. Those outfalls or surface water segments that fail to meet the appropriate water quality standard, and meet or exceed the surfactant and ammonia threshold values, in the absence of potential interferences mentioned in Step IV, indicate a high likelihood for the presence of illicit connections upstream in the drainage system or surface water. Whereas illicit discharges are quite variable in nature, the exceedance of the applicable water quality standard and only the ammonia or surfactant threshold value may well indicate the presence of an illicit connection. When available, the concurrent collection and analyses of PPCP data can greatly assist in confirming the presence of human wastewater. However, such data will not be available in all instances, and the collective data set and information regarding the physical characteristics of each sub-catchment or surface water reach should be used to prioritize outfalls for further investigation. As warranted, data may be released to the appropriate stakeholders, and should be accompanied by an explanation of preliminary findings. Release of EPA data should be fully discussed with the case team or other appropriate EPA staff.

References Cited

Boston Water & Sewer Commission, 2004, *A systematic Methodology for the Identification and Remediation of Illegal Connections*. 2003 Stormwater Management Report, chap. 2.1.

Pitt, R. 2004 *Methods for Detection of Inappropriate Discharge to Storm Drain Systems*. Internal Project Files. Tuscaloosa, AL, in The Center for Watershed Protection and Pitt, R., *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments*: Cooperative Agreement X82907801-0, U.S. Environmental Protection Agency, variously pagged. Available at: <http://www.cwp.org>.

Instrumentation Cited (Manufacturer URLs)

MBAS Test Kit - CHEMetrics K-9400: <http://www.chemetrics.com/Products/Deterg.htm>

Portable Colorimeter – Hach Pocket Colorimeter II: <http://www.hach.com/>

Ammonia (Nitrogen) Test Strips: <http://www.hach.com/>

Portable Temperature/Conductivity/Salinity Meter: YSI Model 30:
<http://www.ysi.com/productsdetail.php?30-28>

Disclaimer: *The mention of trade names or commercial products in this protocol does not constitute endorsement or recommendation for use by the U.S. EPA.*

Attachment 1

Stormwater Monitoring Program QAPP
5/17/12
Revision 1
Page 1 of 7

**Stormwater Monitoring Quality Assurance Project Plan
2012-2017**

RFA #

Sampling Plan Acceptance

EPA OES Enforcement and Project Manager/Coordinator Signature:	 Date:
EPA OEME Project Managers/Coordinator Signature:	 Date:
EPA OEME QA Officer Signature:	 Date:
EPA Chemistry Team Lead Signature:	 Date:

Attachment 1

Stormwater Monitoring Program QAPP
5/17/12
Revision 1
Page 2 of 7

1.0 Background

U.S. EPA Administrative Order 5360.1 requires that “all projects involving environmental monitoring performed by or for the U.S. EPA shall not be undertaken without an adequate Quality Assurance Project Plan (QAPP).” The purpose of this document is to describe the process used to develop, select, manage, and finalize stormwater monitoring projects. In describing this process, quality assurance goals and methods will be established, thus ensuring that the overall program and each monitoring project will meet or exceed EPA requirements for quality assurance.

The objective of these projects will be to collect data that is usable by EPA OES enforcement staff for enforcement actions and information requests. The primary focus of this project will be on urban water stormwater outfalls in the New England Region watersheds.

2.0 Sampling overview

Monitoring will be conducted on pre-scheduled days with the Laboratory. Samples will be retrieved from surface water, in stream or outfalls at suspected hotspots or areas that need further delineation. Sample sites will be located using GPS, with an accuracy goal of ± 1 meter and PDOP less than 6. Less accurate GPS reading or coordinates from maps will be accepted when site or other conditions do not allow ± 1 meter accuracy.

The primary focus of this sampling will be used to identify illegal discharges. Results from the sampling will be used by EPA enforcement staff for enforcement purposes. For this project, sampling will be conducted according to EPA’s Ambient Water Sampling SOP (Table 3). Volunteers and watershed association staff may assist in sampling. All procedures will be followed that are specified in Table 3. Parameter to be sampled will be predetermined by enforcement (OES) and OEME staff, based on data needs.

A. Locations

Site locations will be determined from field or desktop reconnaissance by project staff. Sample analyses will be predetermined based on conditions known about the sampling location prior to sampling. These may include data from previous sampling or from data collected from Mass DEP or local watershed associations. Any of the parameters listed in table 2 may be analyzed.

B. Analytical Methods and Reporting limits

Sample analyses will be conducted by EPA Laboratories.

This effort will test and compare the most appropriate analytical methods including, but not limited to; laboratory analysis, test kits and field analysis to determine the most effective and cost-efficient outfall and in-stream sampling approach.

Multiple and repeated testing will occur at each location to compare different method for identifying sewage contamination.

PPCPs, E.coli and enterococcus will be analyzed by EPA’s Laboratory. Surfactants, ammonia, total chlorine will be analyzed with field test kits. Potential additional laboratory analyses include nitrogen (nitrate/nitrite), TSS, BOD, surfactants, ammonia and TPH. The Laboratory used

Attachment 1

Stormwater Monitoring Program QAPP

5/17/12

Revision 1

Page 3 of 7

for each sampling event will be determined prior to sampling by the OEME Project Manager based on required analyses Laboratory availability and contract funds available.

Where available, a known concentration sample will be used to evaluate the performance of each test method. The known concentration sample will be processed in the field and Laboratory as a routine sample. The analyst or field technician will not know the concentration of the sample prior to analyzing and reporting the sample result. Sampling for PPCP testing will be done using extreme care not to contaminate the sample. No caffeine products should be consumed prior to sampling.

Table 1: Parameter specifications

Parameter (lab - equipment)	Preservation	Holding time
PH	None	Immediate
Temperature	None	Immediate
Sp Cond	None	Immediate
DO	None	Immediate
Total Phosphorus (EPA)	H ₂ SO ₄ (pH <2) + Ice	28 days
TSS (EPA)	Ice	7 days
TSS (Alpha)	Ice	7 days
BOD (Alpha)	Ice	48 hours
Surfactants (Alpha)	Ice	48 hours
Surfactants (field kit – Chemetrics)	None	Immediate
Ammonia (alpha)	H ₂ SO ₄ (pH <2) + Ice	28 days
Ammonia (test strips)	None	Immediate
TPH Petroleum ID (alpha)	Ice	7 Days to extraction 40 days after extraction
E. Coli (EPA)	Ice	6 hrs to lab
Enterococcus (EPA)	Ice	6 hrs to lab
PPCP	Ice (acidified in Lab)	7 day to extraction 40 days after extraction
Chlorine (Field kit – Hach)	None	Immediate

Attachment 1

Stormwater Monitoring Program QAPP
5/17/12
Revision 1
Page 4 of 7

Table 2: Analytical References and Quality Control Goals

Parameter (lab- equipment)	Reporting Limits	Water Quality Criteria or Guidelines (MA or EPA)	Quality Assurance Goals		
			Precision	Accuracy	Completeness
PH	4 to 10 units	6.5 - 8.3	0.02 unit	± 0.3 units	90%
Temperature	0 to +40°C	28.3°C	0.1 °C	± 0.15°C	90%
Sp Cond	0 to 100 mS/cm	NA	5 uS/cm	±10% cal std (µS/cm)	90%
DO	0.5mg/l to Sat	≥5 mg/l , >60% saturation	0.02mg/l	± .5 mg/l	90%
Total Phosphorus (EPA)	5.0 ug/l	NA	Field dup 30% RPD	MS 70-130%	90%
TSS (EPA)	5mg/L	NA	Field dup 30% RPD	See SOP	
TSS (Alpha)	5 mg/L	NA	Field dup 30% RPD	See SOP	90%
BOD (Alpha)	2 mg/L	NA	Field dup 30% RPD	See SOP	90%
Surfactants (field kit – Chemetrics)	0.25 mg/L ¹	0.25 mg/L	Field dup 30% RPD	TBD	90%
Ammonia (test strips)	0.25 mg/L ¹	1.0 mg/L	Field dup 30% RPD	TBD	90%
TPH Petroleum ID (alpha)	Variable	NA	Field dup 30% RPD	See SOP	
E. Coli (EPA)	4 col./ 100 ml	≤126 col./100 ml* ≤ 235 col./100 ml	±100 col/100ml or 30% RPD	N/A	90%
Enterococcus (EPA)	1 col/100ml	≤33 col./100 ml* ≤ 61 col./100 ml	±100 col/100ml or 30% RPD	See SOP	90%
PPCP	TBD	NA	Field dup 50% RPD	TBD	90%
Chlorine (Field kit – Hach)	0.02 mg/l	NA	Field dup 30% RPD	TBD	90%

Note

*Geometric mean Criteria

TBD = To be determined, Field methods and some colorimeter methods do not have accuracy criteria determined.

¹ Needs field verification to confirm

Attachment 1

Stormwater Monitoring Program QAPP
5/17/12
Revision 1
Page 5 of 7

Table 3: Field and Laboratory References

Parameter	Analytical Method Reference	SOP reference
	Field References- 5/2005	
pH		
Conductivity		
Temperature		
dissolved oxygen	n/a	ECASOP-YSISondes9
Ambient water samples	n/a	ECASop-Ambient Water Sampling2
Chain of custody of samples	n/a	EIASOP-CHAINOFCUST
Sample login, tracking, disposition	n/a	EIASOP-ADMLOG14
	Lab. References- 5/2005	
Total Phosphorus (EPA)	EPA 365.3	EIASOP-INGTP8
TSS (EPA)	EPA 160.2	EIASOP-INGTSS-TDS-VRES5
TSS (Alpha)	EPA 160.2,SM2540D	SOP/07-29
BOD (Alpha)	EPA 405.1,SM5210B	SOP/07-13
Surfactants (field kit – Chemetrics)	Chemetrics	Draft
Ammonia (test strips)	Hach	Draft
TPH Petroleum ID (alpha)	8015B (M)	0-017
E. Coli (EPA)	SM9230	ECASOP- TC/EC Colilert2
Enterococcus (EPA)	SM9230	ECASOP-Enterolert1
PPCP	EPA 1694	TBD
Chlorine (Field kit – Hach)	Hach	TBD

*Specific conductance is the only parameter identified as non critical

Bottle list

Table 4: Bottle Sampling List

Parameter (lab - equipment)	Bottle	Preservation
Primary analyses		
E. Coli (EPA)	(2) 120ml or 250ml sterile	Ice
Enterococcus (EPA)		Ice
PPCP	1 Liter Amber	Ice (acidified in Lab)
Optional analyses		
Chlorine (Alpha)	500 ml	Ice
Total Phosphorus (EPA)	125 ml	H ₂ SO ₄ (pH <2) + Ice
TSS (EPA)	1 liter	Ice
TSS (Alpha)	1 liter	Ice
BOD (Alpha)	1 Liter	Ice
TPH Petroleum ID (alpha)	2 -1 Liter Amber Glass tephlon lined	Ice
E. Coli (Alpha)	120 ml sterile	Ice
Enterococcus (Alpha)	120 ml sterile	Ice

Attachment 1

Stormwater Monitoring Program QAPP

5/17/12

Revision 1

Page 6 of 7

C. Quality Control

- Calibration: EPA will calibrate its sondes according to the EPA sonde calibration SOP.
- Field duplicate: One duplicate sample will be collected per sampling event or approximately for every ten samples.
- Trip Blank: OEME Chemist will run appropriate QA samples for PPCP's. One blank sample will be collected for approximately every ten bacteria samples. Reported data that is less than 5 times the trip (field) blank concentration will be flagged.
- QC Criteria: Are specified in table 2, data not meeting this criteria will be reviewed by the Project Manager. Data that does not meet laboratory QA/QC criteria will be flagged by the laboratory.

D. Chain of Custody

Chain of custody procedures will follow the OEME/Investigations Office SOP (Table 3)

3.0 Data Review

EPA Microbiology data will be reviewed by the Biology QAO. Alpha generated microbiology samples will be reviewed by the OEME Project Manager. All field data and draft data reports will be reviewed by the OEME Project manager. Laboratory generated data (from Alpha and EPA) will be reviewed by the Chemistry Team Leader.

4.0 Data reports

Data reports will be reviewed by the Project Coordinator and the OEME Project Manager before a final report is release to the Enforcement Coordinator. Draft reports may be released without a complete review.

Attachment 1

Stormwater Monitoring Program QAPP
5/17/12
Revision 1
Page 7 of 7

5.0 Attachments

- 1) Standard Operating Procedure Enterococcus (SM9230B), Multiple Tube Technique. SOP/07-01 *Alpha Analytical, Inc. May 28, 2005*
- 2) Standard Operating Procedure E. Coli (SM9213D). SOP/07-41 *Alpha Analytical, Inc. May 28, 2005*
- 3) Standard Operating Procedure MBAS, Ionic Surfactants. Draft SOP *EPA Laboratory. January 28, 2010*
- 4) Standard Operating Procedure Nitrogen Ammonia. Draft SOP *EPA Laboratory. February 10, 2011*
- 5) Standard Operating Procedure Total Chlorine. Draft SOP *EPA Laboratory. February 12, 2010*
- 6) Standard Operating Procedure TSS/ TVSS (SM2540 D, EPA 160.2). SOP/07-29 *Alpha Analytical, Inc. September 29, 2007*
- 7) Standard Operating Procedure BOD-5day, SBOD-5day, and cBOD-5day (SM 5210B, and EPA 405.1). SOP/07-13 *Alpha Analytical, Inc. September 29, 2007*
- 8) Standard Operating Procedure TPH 8015D – Modified 0-017 (EPA 8015D Modified) *Alpha Analytical, Inc. March 04, 2008*
- 9) Standard Operating Procedure determination of Trace Elements in Water and Wastes by Inductively Coupled Plasma- Mass Spectrometry (200.8). SOP/06-11 *Alpha Analytical, Inc. July 13, 200*
- 10) Standard Operating Procedure Inductively Coupled Plasma – Mass Spectrometry (6020). SOP/06-10 *Alpha Analytical, Inc. October 25, 2007*

Target Compounds, Uses, and Reporting Limits

Target Compound	Major Use	RL (ng/L)	Daily Dose (ng)
Caffeine	Natural Stimulant	5.0	200,000,000
1,7-DMX	Metabolite of caffeine	2.5	N/A
Acetaminophen	Pain Reliever	2.5	650,000,000
Carbamazepine	Anti- depressant / bi-polar Anti-convulsant (epilepsy)	0.5	100,000,000
Primidone	Anti- epilepsy drug (AED)	5.0	100,000,000
Atenolol	Beta Blocker High Blood Pressure	2.5	50,000,000
Cotinine	Metabolite of Nicotine	0.5	3,500-7,200 (ng/mL)
Urobilin	By-product of hemoglobin breakdown (mammals)	5.0	1,300,000 ng/g in feces
Azithromycin	Antibiotic	1.6	200,000,000

STORMWATER MONITORING

Field Collection Requirements (To be recorded at each site)

Sample-

Site Name _____

Time collected _____

Date collected _____

Inspection-

****Take picture at site****

Outfall diameter _____ ('na' if open stream)

Flow estimate _____ ('na' if open stream)

Odor _____

Color _____

Turbidity _____

Floatables _____

Other observations _____

YSI Meter (calibrate in lab)-

Salinity _____

Temp _____

Conductivity (give both #'s)

Location information-

Short description of where sample was collected at site _____

GPS _____

Field Kits listed in the order they should be conducted in, include any applicable notes-

NH3 strip _____

Cl2 kit _____

Hach meter - (3 min wait)

Surfactant _____

Chemetrics K-9400 Blue box/detergent test kit

Additional Notes:

(Note any changes in weather conditions) _____

STORMWATER MONITORING (PAGE 2)

Field Equipment List

Waste Containers (2 total – clearly labeled):

- 1 liter amber plastic for surfactants/detergents kit waste
- 1 liter amber plastic for Cl2 kit waste

Sample Bottles (3 total for each sample location)-

- 120ml sterile – E.coli/entero
- 1 Liter amber glass: PPCP, EPA (Peter Philbrook)
- 120ml-250ml plastic – Field Kit Bottle – to be used on site for kits listed above

***Fill out chain of custody

In Carboy Container

- ☐ Log book
- ☐ COC forms
- ☐ Extra sample bottles
- ☐ Colored tape
- ☐ Sharpies
- ☐ Write-On-Rain Pens
- ☐ Paper towels
- ☐ GPS
- ☐ Sampling plan & GPS locations
- ☐ Regular length Powder Free Gloves
- ☐ Squirt bottle of DI Water
- ☐ Coolers with Ice
- ☐ Waders/Boots
- ☐ YSI multi parameter Meter